

**EXHIBIT 12**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**DREW J. RIBAR, Pro Se Plaintiff**

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

**v.**

**WASHOE COUNTY, et al.**

**Defendants.**

**Case No.: 3:24-cv-00526-ART-CLB**

**EXHIBIT 12**

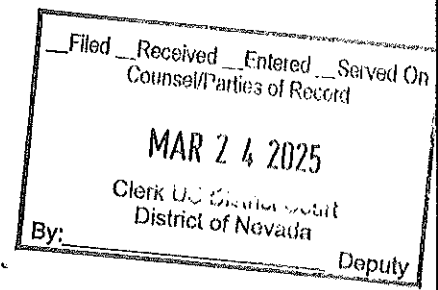
**Title:** Internal Communications Regarding Volunteer Coordination for RainbowFest and Drag  
Queen Story Hour (DQSH)

**Date:** May 5, 2023

**Source:** Internal email correspondence between Washoe County Library System (WCLS)  
officials and Build Our Center, Inc. representatives

**Bates Number Range:** EXH064-EXH069

PLEADING TITLE - I



1 **DESCRIPTION**

2  
3 This exhibit contains internal emails among Washoe County Library System (WCLS) officials  
4 and Build Our Center, Inc. (BOC) representatives, including:  
5

- 6 • **Judy Hansen** (Youth Services & Events Librarian, WCLS)  
7 • **Jamie Hemingway** (Public Information and Development Officer, WCLS)  
8 • **Pam Larsen** (Librarian, North Valley Library Branch)  
9 • **Kristen Ryan** (WCLS Representative)  
10 • **Stacey Spain** (Programs and Operations Manager, BOC)  
11 • **Christopher Daniels** (BOC Representative, Drag Story Hour Performer)  
12 • **Kelly Tanguay** (BOC Volunteer Coordinator)  
13 • **Jonnicia Bowen** (Library Manager, WCLS)  
14 • **Beate Weinert** (Youth Services Manager, WCLS)  
15  
16

17 The emails confirm the following:  
18

- 19 1. **BOC had primary control over volunteer selection** for Drag Queen Story Hour  
20 (DQSH), prioritizing their own organization's participants before allowing the general  
21 public to apply.  
22  
23 2. **Washoe County Library officials deferred to BOC** on event volunteer applications,  
24 QR code distribution, and social media outreach.  
25  
26 3. **WCLS and BOC collaborated on publicity efforts**, including coordinated social media  
27 cross-tagging to boost reach.  
28

1 4. **WCLS staff actively sought corrections to promotional materials**, including altering  
2 event branding to align with national DQSH policy changes.

3 5. **Library representatives explicitly acknowledged BOC's control over volunteer**  
4 **application processes**, reinforcing that BOC acted as a de facto state actor rather than  
5 an independent nonprofit.  
6

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9 **RELEVANCE TO CASE**  
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11 This exhibit is **directly relevant to multiple claims** in the First Amended Complaint:  
12

13 **1. Violation of the First Amendment (42 U.S.C. § 1983)**  
14

- 15 • Establishes **viewpoint discrimination** by showing **government actors delegated event**  
16 **control** to a private entity (BOC) that **excluded dissenting voices** (see **Rosenberger v.**  
17 **Rector, 515 U.S. 819 (1995)**).
- 18 • Demonstrates that BOC functioned **as a government proxy** to suppress speech, making  
19 them a **state actor** under **Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982)**.  
20

21 **2. Fourteenth Amendment Due Process Violation**  
22

- 23 • Shows that **WCLS officials deferred discretionary public access decisions to BOC**,  
24 violating procedural due process rights (see **Mathews v. Eldridge, 424 U.S. 319 (1976)**)).  
25

26 **3. Monell Liability for Unconstitutional Policies**  
27  
28

- Documents Washoe County's explicit policy of enabling a private entity to make public policy decisions on a government platform (see *Monell v. Dept. of Social Services*, 436 U.S. 658 (1978)).

#### 4. Refuting Defendant's Motion to Dismiss

- If BOC argues it was merely an independent partner, this evidence proves joint action with Washoe County Library System and strengthens the case for holding them liable under state action doctrine.

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### CERTIFICATE OF AUTHENTICITY

I, **Drew J. Ribar**, certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the attached Exhibit 12 is a **true and accurate copy** of internal email correspondence obtained from **public records requests** and internal sources related to RainbowFest and Drag Queen Story Hour event coordination.

**Dated:** March 17, 2025

**Respectfully submitted,**

/s/ **Drew J. Ribar**

**Drew J. Ribar, Pro Se**

3480 Pershing Ln

Washoe Valley, NV 89704

PLEADING TITLE - 4

1 (775) 223-7899

2 Const2Audit@gmail.com

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PLEADING TITLE - 5

**From:** Hansen, Judy <JHansen@washoecounty.gov>  
**Sent:** 05 May 2023 21:46  
**To:** Hemingway, Jamie; Kelly Tanguay; Larsen, Pam  
**Cc:** stacey@ourcenterreno.org; Christopher Daniels; Ryan, Kristen; Sloan, Tyna; Dickman, Corinne; Talarico, Lori A.; Bowen, Jonnica L.; Scott, Jeff; Weinert, Beate  
**Subject:** Re: Notes from RainbowFest Volunteer Meeting on 4.25.2023  
**Attachments:**

Hi Kelly,

Thank you for organizing the volunteer application. I just have one additional edit:

Please change the North Valleys event to **June 17** currently it says July 17.

~~July 17th~~: North Valleys Library Rainbow Festival (North Valleys) 10:00 am – 2:00 pm

We appreciate all you work on organizing the volunteers.



Judy

</A>

Judy Hansen

Youth Services & Events Librarian | Washoe County Library System

jhanzen<span style="margin: 0px; color:

blue;">@washoecounty.gov</Span></A> | Office: 775.327.8318

301 S. Center Street, Reno, NV 89501

</A> </A> </A> </A>

EXH 064

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**From:** Hemingway, Jamie <JHemingway@washoecounty.gov>;  
**Sent:** Friday, May 5, 2023 2:41 PM  
**To:** Kelly Tanguay <kelly@ourcenterreno.org>; Larsen, Pam <PLarsen@washoecounty.gov>;  
**Cc:** stacey@ourcenterreno.org <stacey@ourcenterreno.org>; Christopher Daniels  
<christopher.w.daniels@gmail.com>; Ryan, Kristen <kryan@washoecounty.gov>; Sloan, Tyna  
<TSloan@washoecounty.gov>; Dickman, Corinne <CDickman@washoecounty.gov>; Talarico,  
Lori A. <LTalarico@washoecounty.gov>; Bowen, Jonnica L. <JBowen@washoecounty.gov>;  
Scott, Jeff <jscott@washoecounty.gov>; Weinert, Beate <BWeinert@washoecounty.gov>;  
Hansen, Judy <JHansen@washoecounty.gov>;  
**Subject:** Re: Notes from RainbowFest Volunteer Meeting on 4.25.2023

Hi Kelly,

Thank you so much for sharing this with the library team! I oversee marketing and manage our social media accounts. I will keep an eye out for your social media tags on our accounts.

I just have a couple of edits on the graphic.

1. Can you change Washoe County Libraries to the singular Washoe County Library.
2. The Drag Story Hour nonprofit group in NYC has removed the word "queen" from the name. Can it be changed to Drag Story Hour?

That's it!

Let me know if you need anything else from me.

Thanks again,

Jamie

Get [Outlook for iOS](#)

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**From:** Kelly Tanguay <kelly@ourcenterreno.org>;  
**Sent:** Friday, May 5, 2023 2:18:05 PM  
**To:** Larsen, Pam <PLarsen@washoecounty.gov>;

EXH065

Cc: stacey@ourcenterreno.org &lt;stacey@ourcenterreno.org&gt;; Christopher Daniels &lt;christopher.w.daniels@gmail.com&gt;; Ryan, Kristen &lt;kryan@washoecounty.gov&gt;; Sloan, Tyna &lt;TSloan@washoecounty.gov&gt;; Dickman, Corinne &lt;CDickman@washoecounty.gov&gt;; Talarico, Lori A. &lt;LTalarico@washoecounty.gov&gt;; Bowen, Jonnica L. &lt;JBowen@washoecounty.gov&gt;; Scott, Jeff &lt;jscott@washoecounty.gov&gt;; Hemingway, Jamie &lt;JHemingway@washoecounty.gov&gt;; Weinert, Beate &lt;BWeinert@washoecounty.gov&gt;; Hansen, Judy &lt;JHansen@washoecounty.gov&gt;;  
Subject: Re: Notes from RainbowFest Volunteer Meeting on 4.25.2023

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]  
Hello everyone!

I created a volunteer application for the DQSH events. Link is here: [DQSH Volunteer Application](#)

I'll be distributing it to Our Center volunteers, staff, board members, and group ambassadors today. I'll also be posting a flyer on Our Center's socials advertising the "call" for volunteers. That being said, we'll still need a lot of hands on deck. Please distribute the link, QR code (see attached), and IG flyer (see attached) however you see fit. If you'd like to print out the QR code/flyer and post in physical locations, please feel free. If you'd like to share the link and/or QR code with friends, your personal social pages, or via email- please do!

Like Stacey and I had mentioned earlier, we will be offering spots to Our Center participants first, then Pride participants, and then the general public.

My family and a handful of my friends will be filling out the application. I encourage you to share with folks you know and trust!

Please let me know if you have any questions/edits/or concerns. I'll be tagging @washoecountylibrary and several other event participants on socials, but let me know if there is any other cross-promotion I should be focusing on when sharing from OC's pages.

Very excited!

Warmly,

EXH066



Kelly Tanguay

On Fri, Apr 28, 2023 at 3:35 PM Larsen, Pam <[PLarsen@washoecounty.gov](mailto:PLarsen@washoecounty.gov)> wrote:

Hello Chris

Oops! I forgot to include you. Here are the notes from our meeting on last Tuesday. Here y'all go.

Thanks & Take Care,

Pam

—  
Pam Larsen, MLIS  
Librarian | North Valley Library Branch  
Washoe County Library System  
[plarsen@washoecounty.gov](mailto:plarsen@washoecounty.gov) | Office: 775.972.0281  
1075 North Hills Boulevard, Suite 340, Reno, NV 89506  
— — — —

EXH067

*My regular work schedule is Tuesday through Saturday.*

**From:** Larsen, Pam <PLarsen@washoecounty.gov/A>&gt;  
**Sent:** Friday, April 28, 2023 3:31 PM  
**To:** <kelly@ourcenterreno.org/A> <kelly@ourcenterreno.org/A>&gt;;  
<stacey@ourcenterreno.org/A> <stacey@ourcenterreno.org/A>&gt;  
**Cc:** Ryan, Kristen <kryan@washoecounty.gov/A>&gt;; Sloan, Tyna  
<TSloan@washoecounty.gov/A>&gt;; Dickman, Corinne <CDickman@washoecounty.gov/A>&gt;;  
Talarico, Lori A. <LTalarico@washoecounty.gov/A>&gt;; Bowen, Jonnica L.  
<JBowen@washoecounty.gov/A>&gt;; Scott, Jeff <jscott@washoecounty.gov/A>&gt;;  
Hemingway, Jamie <JHemingway@washoecounty.gov/A>&gt;; Weinert, Beate  
<BWeinert@washoecounty.gov/A>&gt;; Hansen, Judy <JHansen@washoecounty.gov/A>&gt;  
**Subject:** Notes from RainbowFest Volunteer Meeting on 4.25.2023

Hello All

Here are the notes I took from our meeting the other day. Let me know if there is anything that needs to be clarified.

Thanks & Take Care,

Pam

Pam Larsen, MLIS  
Librarian | North Valley Library Branch  
Washoe County Library System

EXH068

[plarsen@washoecounty.gov](mailto:plarsen@washoecounty.gov) | Office: 775.972.0281  
1075 North Hills Boulevard, Suite 340, Reno, NV 89506

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*My regular work schedule is Tuesday through Saturday.*

EXH069